



GABRIEL P. HARVIS  
BAREE N. FETT

August 15, 2016

BY ECF

Honorable Robert M. Levy  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Cortes v. City of New York, et al.*, 14 CV 3014 (SLT) (RML)

Your Honor:

I represent plaintiff in the above-referenced civil rights action. I write jointly with defendants to respectfully request a final extension of the discovery deadline from August 15, 2016 to August 30, 2016. I apologize for submitting this application on the date of the deadline.

The parties have continued to make progress toward completing fact discovery. Three disputes have arisen that will likely require Court intervention, including a dispute as to whether a party must appear for a continued deposition. Twelve depositions have been taken and the parties have agreed to conduct four more, including a sergeant, a police officer and two FDNY EMTs. The proposed final extension should allow the parties an opportunity to brief the outstanding issues and conduct the remaining depositions.

Accordingly, the parties respectfully request that the deadline for the completion of fact discovery be extended until August 30, 2016 and the deadline to submit a pre-motion application be extended from September 15, 2016 until September 30, 2016.

Hon. Robert M. Levy

Aug. 15, 2016

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: ACC Elissa Jacobs, Esq.